

I write in support of the petitions filed by NCVEC (RM-10787) and NCI (RM-10786).

Removing the Morse code requirement will not harm the Amateur Radio Service or the use of code as an operating mode. Those who love communicating by "dits and dahs" will continue to promote the use and appreciation of Morse code.

The comments submitted by CQ Communications provide excellent suggestions for merging the Novice and Technician licenses and extending access to the 10 meter band. I would like to see the immediate adoption of the CQ operating proposals.

As noted in the NCI petition, the FCC has the authority to modify its regulations without waiting for the completion of a formal rulemaking proceeding. Since a full NPRM covering the Part 97 issues raised by WRC03 is not currently scheduled until late 2004, any changes regarding the code requirement might not take effect before 2005. Such a delay in lifting the code requirement will put US radio amateurs at a disadvantage relative to those in the Europe, where entry level license holders are already gaining increased access to HF amateur spectrum.

For this reason, I urge that the FCC issue an order that immediately removes the Element 1 code testing requirement for the General class license on a provisional basis. Existing Novice or Technician class license holders could gain "provisional" General class license status by passing the Element 3 General class test.

It can be reasonably argued that implementing all of the operating changes included in the several petitions generated by the code requirement issue requires the use of a formal NPRM in order to properly consider the impact of significant changes in license structure, testing requirements and Amateur Service spectrum access.

However, the need for a NPRM should not be used as a justification to deny Technician class license holders access to the HF bands for the many months that this process may require.

Respectfully,

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